## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF OKLAHOMA

KYLE M. SWISHER,	)
Plaintiff,	)
$\mathbf{v}_{\mathbf{v}}$	) Case No. 5:14-cv-00028-HE
STRYKER CORPORATION; CORIN GROUP PLC; and CORIN USA LIMITED,	) ) )
Defendants.	ý )

## **DECLARATION OF MICHAEL CARTIER**

Michael Cartier, of lawful age, states under penalty of perjury:

- 1. I am Deputy General Counsel of Stryker Corporation, I have worked as an attorney for Stryker Corporation since 1999 and am authorized to speak on behalf of Stryker Corporation concerning the matters set forth in this Declaration.
- 2. I am familiar with the First Amended Complaint filed by Kyle Swisher against Stryker Corporation, Corin Group PLC, and Corin USA Limited in the United States District Court for the Western District of Oklahoma in Case No. 5:14-cv-00028-HE.
- 3. Stryker Corporation is a Michigan corporation with its principal places of business in Michigan.
- 4. Stryker Corporation is not engaged in business in Oklahoma, nor has it registered to do so with the State of Oklahoma.
  - 5. Stryker Corporation does not pay Oklahoma income taxes.
- 6. Stryker Corporation does not generate revenue from the implants alleged in the Complaint.
  - 7. None of Stryker Corporation's operations are located in Oklahoma.

- 8. Stryker Corporation maintains no agents, offices or bank accounts in Oklahoma.
- 9. Stryker Corporation maintains no telephone listings in Oklahoma.
- 10. Stryker Corporation does not own real estate in Oklahoma
- 11. Stryker Corporation does not conduct any of its business activities in Oklahoma
- 12. Stryker Corporation was not involved in the development design, manufacture, sale or distribution of Cormet Advanced Hip Resurfacing System which is the subject of Plaintiff's First Amended Complaint.

Signed under penalty of perjury this 2 day of July, 2014.

Michael Cartier

Deputy General Counsel Stryker Corporation

## CERTIFICATE OF SERVICE

I hereby certify that on the day of July, 2014, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

Robert G. McCampbell Mark K. Stonecipher A. Wayne Billings

/s/ John R. Woodard, III
John R. Woodard, III